



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

224 South Arthur • Pocatello, Idaho 83204-3202 • (208) 236-6160

Dirk Kempthorne, Governor
C. Stephen Allred, Director

October 20, 2000

CERTIFIED MAIL # Z 271 710 129

Donald R. Wind
Sr. Environmental Engineer
P4 Production, LLC
P.O. Box 816
Soda Springs, Idaho 83276-0816

RE: T2-000326, P4 Production, LLC, Soda Springs
Emission Reductions - Scaleroom Scrubber Shutdown
Amended Tier II Operating Permit No. #042-00001

Dear Mr. Wind:

On August 21, 2000, the Idaho Department of Environmental Quality (DEQ) received an application for amending Tier II Operating Permit (OP) No. #042-00001 from P4 Production. On October 10, 2000, the application was declared complete.

Based on review of your application, state and federal rules and regulations, and comments received, DEQ finds this project meets the provisions of IDAPA 58.01.01.400 (*Rules for the Control of Air Pollution in Idaho*). Therefore, enclosed is the amended and renewed Tier II OP #042-00001 for the emissions that exist at your facility, which supersedes the permit issued on April 3, 1990. One-time source tests completed to demonstrate compliance with the permit issued on April 3, 1990 do not need to be repeated for this permit.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 38706-1255, within thirty-five (35) days of the date of this decision. However, DEQ encourages you to contact the Air Quality Permit Program to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Rick Elkins, of the Pocatello Regional Office, at (208) 236-6160.

Sincerely,

Mark Dietrich
Regional Administrator
Pocatello Regional Office

Enclosure

cc: ~~Marilyn Seymore~~, DEQ State Office ~~de~~
Pocatello Regional Office
L. Kral, EPA - Region 10

State of Idaho
Department of Environmental Quality

AIR POLLUTION OPERATING PERMIT

GENERAL INFORMATION

PERMIT NUMBER

0 4 2 - 0 0 0 0 1

AQCR

0 6 1

CLASS

A

SIC

2 8 1 9

ZONE

1 2

UTM COORDINATE (km)

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1. PERMITTEE

P4 Production, LLC

2. PROJECT

Emission Reduction - Scaleroom Scrubber Shutdown

3. MAILING ADDRESS

PO Box 816

TELEPHONE

(208) 547-4300

COUNTY

Caribou

4. CITY

Soda Springs

STATE

Idaho

ZIP CODE

83276

5. PERSON TO CONTACT

Beth Elroy

TITLE

Sr. Environmental Engineer

6. EXACT PLANT LOCATION

2 miles North of Soda Springs, Idaho on Highway 34

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Elemental Phosphorus Production

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, Section 58.01.01.400 and pertains only to emissions of air contaminants which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF DESIGN INFORMATION PRESENTED IN THE APPLICATION AND THE IDAHO DEPARTMENT OF ENVIRONMENTAL QUALITY'S (DEQ) TECHNICAL ANALYSIS OF THE SUPPLIED INFORMATION. CHANGES IN DESIGN OR EQUIPMENT, THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MAY BE A MODIFICATION. MODIFICATIONS ARE SUBJECT TO DEQ REVIEW IN ACCORDANCE WITH SECTION 58.01.01.200 OF THE *RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO*.

DISCLAIMER: This document may serve as a Preliminary Inspection Finding Form for use by Department personnel in communicating your compliance status upon inspection. It does not constitute a final determination of compliance status with the Idaho Code or any rules promulgated, permits issued, or consent or judicial orders entered into pursuant to the law. The Idaho Department of Environmental Quality reserves the right to supplement this document with additional compliance determinations, and amend, change, or otherwise modify any compliance determination stated in this document. This document in no way restricts the state of Idaho, Department of Environmental Quality from taking any action available under law to address past, present, or future violations of the laws administered by the agency.

Tiffany Hud for MARK DIETRICH

REGIONAL ADMINISTRATOR
POCATELLO REGIONAL OFFICE
DEPARTMENT OF ENVIRONMENTAL QUALITY

ISSUED DATE October 23, 2000

EXPIRATION DATE October 23, 2005

Source: A. Undried Quartzite Handling to Screening and Storage

FOR DEQ USE ONLY

[illegible]

1. EQUIPMENT LISTING

This permit pertains to:

- 1.1 Raw quartzite loader
- 1.2 Coke and quartzite hopper 105
- 1.3 Conveyor belt 105
- 1.4 Baghouse 105, with stack 51 feet high and 1.8 feet diameter
- 1.5 Coke and quartzite dryer feed bin
- 1.6 Conveyor belt 124
- 1.7 Coke handling baghouse, with stack 60 feet high and 4.0 feet diameter
- 1.8 Conveyor belt 123
- 1.9 Coke and quartzite dryer scrubber, Dustractor brand, with stack 60 feet high and 4.0 feet diameter
- 1.10 Conveyor belt 201
- 1.11 South quartzite screen
- 1.12 North quartzite screen
- 1.13 Quartzite fines bin
- 1.14 Scaleroom quartzite bin
- 1.15 Nodule crushing and screening scrubber, with stack 81 feet high and 11.5 feet diameter; and
- 1.16 Dust vacuum truck.

2. EMISSIONS LIMITS

2.1 Baghouse 105 Stack

- 2.1.1 Particulate emissions shall not exceed 20.00 pounds per hour, as determined by a U.S. EPA Reference Method 5, or approved alternative, emission test. Annual particulate emissions shall not exceed 72.8 tons per year, as determined by multiplying the actual emission rate measured by a U.S. EPA Reference Method 5, or approved alternative, emission test or the allowable hourly emission rate (if actual is not available) by the actual hours of operation per year.
- 2.1.2 Visible emissions shall not exceed 20 percent opacity for more than 3 minutes in any 60 minute period, as required in IDAPA 58.01.01.625 (*Rules for the Control of Air Pollution in Idaho*), and as determined using the Department's "Procedures Manual."

2.2 Coke-handling Baghouse Stack

- 2.2.1 Particulate emissions shall not exceed 20.00 pounds per hour, as determined by a U.S. EPA Reference Method 5, or approved alternative, emission test. Annual particulate

Inspection Comments:

ISSUED DATE:	October 23, 2000
EXPIRATION DATE:	October 23, 2005

Source: A. Undried Quartzite Handling to Screening and Storage

Permittee: P4 Production, LLC
Project: Tier II Operating Permit
Location: Soda Springs, ID

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FOR DEQ USE ONLY

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This permit pertains to:

- 1.1 Nodule (middle) scaleroom bins 1, 2, 3, 4, 5, and 6;
- 1.2 Nodule (middle) weigh bins 1, 2, 3, 4, 5, and 6;
- 1.3 Quartzite (north) scaleroom bin 7;
- 1.4 Quartzite (north) weigh bin 7;
- 1.5 Coke (south) scaleroom bins 8, 9, 10, and 11;
- 1.6 Coke (south) weigh bins 8, 9, 10, and 11;
- 1.7 Conveyor belt 416;
- 1.8 Scaleroom baghouse, with stack 60 feet high and 3.2 feet diameter
- 1.9 Rotary distributor 421;
- 1.10 Conveyor belt 417
- 1.11 Rotary stock distributor 672;
- 1.12 Conveyor belt 713;
- 1.13 Conveyor belt 714
- 1.14 6 - Furnace 7 stock bins
- 1.15 Furnace 7 CO baghouse, with stack 148 feet high and 1.2 feet diameter
- 1.16 Conveyor belt 418;
- 1.17 Furnace 8 stock diverter;
- 1.18 Conveyor belt 12W;
- 1.19 Conveyor belt 12E;
- 1.20 12 - Furnace 8 Stock bins
- 1.21 Furnace 8 CO baghouse, with stack 155 feet high and 1.5 feet diameter;
- 1.22 Conveyor belt 419;
- 1.23 Furnace 9 Stock diverter
- 1.24 Conveyor belt 420W;
- 1.25 Conveyor belt 420E;
- 1.26 12 - Furnace 9 stock bins;
- 1.27 Furnace 9 CO baghouse, with stack 176 feet high and 1.5 feet diameter;
- 1.28 Furnace stocking system baghouse, with stack 80 feet high and 2.5 feet diameter;
- 1.29 Furnace stocking system baghouse dust container; and
- 1.30 Dust vacuum truck.

2.1 Scaleroom (Quartzite Handling) Baghouse Stack

- 2.1.1 Particulate emissions shall not exceed 2.00 pounds per hour, as determined by a U.S. EPA Reference Method 5, or approved alternative, emission test. Annual particulate

Inspection Comments:

ISSUED DATE:	October 23, 2000
EXPIRATION DATE:	October 23, 2005

Source: B. Phosphate Ore Nodules, Coke, and Quartzite Proportioning and Handling to the Furnace Stocking Area

[illegible]

2.4.1 Particulate emissions shall not exceed 7.88 pounds per hour, as determined by a U.S. EPA Reference Method 5, or approved alternative, emission test. Annual particulate emissions shall not exceed 32.4 tons per year, as determined by multiplying the actual emission rate measured by a U.S. EPA Reference Method 5, or approved alternative.

Inspection Comments:

ZQK:b-m T2000326.PM

Source: B. Phosphate Ore Nodules, Coke, and Quartzite Proportioning and Handling to the Furnace Stocking Area

ZCX:pm T2000326 PM

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Source: B. Phosphate Ore Nodules, Coke, and Quartzite Proportioning and Handling to the Furnace Stocking Area

FOR DEQ USE ONLY

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The permittee shall submit to the Department all emission test data, visible emission observation data recorded during the test, the process weight rate recorded during the test, and the average baghouse pressure drop recorded during the test within 30 days after the emission test.

Inspection Comments:

ISSUED DATE:	October 23, 2000
EXPIRATION DATE:	October 23, 2005

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- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.
- B. The Permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The Permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - 1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- E. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the Permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the Permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures to be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.

Inspection Comments:

ISSUED DATE:	October 23, 2000
EXPIRATION DATE:	October 23, 2005